REMARKS

The Applicants respectfully request reconsideration of this application in view of the above amendments and the following remarks.

35 U.S.C. §102(e) Rejection - Hsu

The Examiner has rejected claims 22-23, 27-28 and 45-46 under 35 U.S.C. §102(e) as being anticipated by U.S. No. 6,288,896 issued to Hus (hereinafter referred to as "Hsu"). The Applicants respectfully submit that the present claims are allowable over Hsu.

Claim 22 recites a display comprising "*a lamp to illuminate the display; and a heat pipe including a liquid capable of vaporizing coupled to the lamp to transfer heat from a heat generating component of a system to the lamp in the display, wherein the* ***heat pipe is coupled to an end of the lamp***".

Hsu does not teach or suggest these limitations. In particular, Hsu does not teach or suggest that the **heat pipe is coupled to an end of the lamp.** The Examiner has submitted that this is shown in Fig. 7A. However, Fig. 7A does not show that the heat pipe is coupled to an end of the lamp. Rather, the second and third heat pipes 30, 70 are merely positioned within lid assembly 14 along the side of display. See e.g., column 8, lines 33-43. Accordingly, Hsu does not teach all of the limitations of claim 22.

Anticipation under 35 U.S.C. Section 102 requires every element of the claimed invention be **identically shown** in a single prior art reference. The Federal Circuit has indicated that the standard for measuring lack of novelty by anticipation is strict identity. "*For a prior art reference to anticipate in terms of 35 U.S.C. Section 102, every element*

of the claimed invention must be identically shown in a single reference." In Re Bond, 910 F.2d 831, 15 USPQ.2d 1566 (Fed. Cir. 1990).

For at least these reasons, independent claim 22 and its dependent claims are believed to be allowable over Hsu.

35 U.S.C. §102(e) Rejection - Woo

The Examiner has rejected claims 29-35 and 48 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Publication No. 2003/0132929 issued to Woo (hereinafter referred to as "Woo"). The Applicants respectfully submit that the present claims are allowable over Woo.

Claim 29 recites a system comprising "*a display and a lamp to illuminate the display; at least one heat generating component; a transfer unit to transfer heat from the heat generating component to the lamp; and a unit to control a level of heat provided to the lamp to maintain a level of brightness generated by the lamp*".

Woo does not teach or suggest these limitations. In particular, Woo does not teach or suggest a unit to **control a level of heat provided to the lamp** to maintain a level of brightness generated by the lamp. The Examiner has apparently argued that Woo discloses this in paragraphs [0024; 0025; and 0026]. Applicants respectfully disagree. A careful review of these paragraphs reveals that there is absolutely no disclosure of controlling the level of heat provided to the lamp, let alone controlling the level of heat provided to the lamp in order to maintain a level of brightness generated by the lamp. Rather, as understood by Applicants, the power supplied to the LCD appears to be controlled. See e.g., the last sentence of paragraph [0024]; the fourth sentence of paragraph [0008]; and the last two sentences of paragraph [0018]. Accordingly, Woo

does not teach or suggest a unit to **control a level of heat provided to the lamp** to maintain a level of brightness generated by the lamp.

Anticipation under 35 U.S.C. Section 102 requires every element of the claimed invention be **identically shown in a single prior art reference.** The Federal Circuit has indicated that the standard for measuring lack of novelty by anticipation is strict identity. *"For a prior art reference to anticipate in terms of 35 U.S.C. Section 102, every element of the claimed invention must be identically shown in a single reference."* In Re Bond, 910 F.2d 831, 15 USPQ.2d 1566 (Fed. Cir. 1990).

For at least these reasons, independent claim 29 and its dependent claims are believed to be allowable over Woo.

35 U.S.C. §103(a) Rejection – Hsu and Woo

The Examiner has rejected claims 24-26, 36, 40-44, 47, and 49-50 under 35 U.S.C. §103(a) as being unpatentable over Hsu in view of Woo. Without admitting the appropriateness of combining Hsu and Woo, Applicants respectfully submit that these claims are allowable over Hsu and Woo.

Claim 36 recites an apparatus comprising *"at least one heat generating component; a transfer unit to transfer heat from the at least one heat generating component to a lamp of a display, wherein the transfer unit comprises a heat pipe including a liquid capable of vaporizing proximate the lamp, and wherein the transfer unit comprises **a fan or synthetic jet unit to generate air movement across the heat pipe** and have the heated air flow against the lamp"*.

Hsu and Woo do not teach or suggest these limitations. In particular, Hsu and Woo does not teach or suggest a **fan or synthetic jet unit to generate air movement across the heat pipe** and have the heated air flow against the lamp. The Examiner has

admitted that Hsu does not teach a fan or synthetic jet. See e.g., page 7 of the Office Action. The Examiner has asserted that Woo discloses a fan 120. However, Applicants respectfully submit that the fan 120 of Woo is not used to generate air movement across the heat pipe and have the heated air flow against the lamp. Rather, as clearly shown in Figure 1 of Woo, the fan 120 may be installed in heat-generating part 110 (i.e., a CPU) to discharge heat generated from heat generating part 110. There is no teaching or suggestion in either Woo or Hsu, or in the knowledge generally available to those skilled in the art, to use a **fan or synthetic jet unit to generate air movement across the heat pipe** and have the heated air flow against the lamp.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the references or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest **all the claim limitations**. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure. In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

For at least this reason, independent claim 36 and its dependent claims are believed to be allowable over Hsu and Woo, which combination may not even be appropriate.

Conclusion

In view of the foregoing, it is believed that all claims now pending patentably define the subject invention over the prior art of record and are in condition for allowance. Applicants respectfully request that the rejections be withdrawn and the claims be allowed at the earliest possible date.

Request For Telephone Interview

The Examiner is invited to call Brent E. Vecchia at (303) 740-1980 if there remains any issue with allowance of the case.

Request For An Extension Of Time

The Applicants respectfully petition for an extension of time to respond to the outstanding Office Action pursuant to 37 C.F.R. § 1.136(a) should one be necessary. Please charge our Deposit Account No. 02-2666 to cover the necessary fee under 37 C.F.R. § 1.17 for such an extension.

Charge Our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: 5/22/06

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